BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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In the Matter of

PACIFIC POWER & LIGHT COMPANY,

DOCKET UE-170717

PETITION TO INTERVENE OF BOISE WHITE PAPER, L.L.C.

2016 Power Cost Adjustment Mechanism.

Pursuant to WAC § 480-07-355, Boise White Paper, L.L.C. ("Boise") hereby

petitions the Washington Utilities and Transportation Commission ("WUTC" or "Commission")

for leave to intervene in the above-referenced docket as an intervenor with full party status, as

described in WAC § 480-07-340. The business address for Boise is:

Patrick Loupin Corporate Purchasing Manager – Energy Boise White Paper, L.L.C. P.O. Box 990050 Boise, ID 83799-0050 PatrickLoupin@packagingcorp

Boise will be represented in this proceeding by Davison Van Cleve, P.C

("DVC"). All documents relating to this proceeding should be served on Boise through its

designated representative above, as well as on Boise's attorney and independent consultant,

respectively, at the following addresses:

Jesse E. Cowell Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 jec@dvclaw.com Telephone: (503) 241-7242 Bradley G. Mullins 333 S.W. Taylor, Suite 400 Portland, OR 97204 brmullins@mwanalytics.com Telephone: (503) 954-2852

Boise does not request paper service, unless required by WUTC rules or law. If permitted by the

presiding officer, Boise also requests that electronic service be provided to the following:

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

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Jesse O. Gorsuch jog@dvclaw.com Administrative staff for DVC Haley M. Thomas hmt@dvclaw.com Administrative staff for DVC

The administrative rules at issue are WAC § 480-07-340, -355.

Boise manufactures and distributes paper products in the United States, including sheet papers, containerboard and corrugated containers, and market pulp. Boise is Pacific Power & Light Company's ("Pacific Power" or the "Company") largest customer in Washington, purchasing both power and power delivery services at its mill in Wallula, Washington. Boise was a party to Pacific Power's most recent rate case, Docket UE-152253, as well as the Company's last general rate case, Dockets UE-140762, *et al.*

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Boise has a substantial interest in Pacific Power's 2016 Power Cost Adjustment Mechanism ("PCAM"), which potentially allows the Company to either recover or refund unexpected variations in its power costs. As Pacific Power's largest Washington customer, Boise could be substantially and directly affected by Pacific Power's calculation of its PCAM deferral. Thus, Boise requests leave to intervene in this Docket to represent its interests which are directly affected by Pacific Power's PCAM.

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Boise's legal counsel and expert have extensive experience in proceedings before the Commission involving Pacific Power tariffs, rules, and rate schedules. Boise has participated in several Company proceedings, most recently including UE-140762, U-151958, UE-152253, and UE-161204. Boise's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Boise will take the position of supporting PCAM results that will be shown to be fair, just, and reasonable.

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As described above, Boise has a direct and substantial interest in this proceeding

that will not be adequately represented by any other party, and may be affected by any

Commission determination made in connection with this proceeding. Thus, it is in the public

interest to allow Boise to intervene in this proceeding.

WHEREFORE, Boise respectfully petitions the Commission for leave to

intervene in this proceeding.

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Dated this 12th day of September, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Jesse E. Cowell</u> Jesse E. Cowell, WSBA # 50725 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 Telephone: (503) 241-7242 E-Mail: jec@dvclaw.com Of Attorneys for Boise White Paper, L.L.C.

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